

PHILLIP A. TALBERT  
United States Attorney  
ANTONIO J. PATAKA  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ANGEL SANCHEZ,  
  
Defendant.

CASE NO. 1:22-CR-00267-JLT-SKO  
STIPULATION SETTING CHANGE OF PLEA  
HEARING; ORDER

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on March 6, 2024.
2. By this stipulation, defendant now moves to vacate the status conference on March 6, 2024, and set a change of plea hearing on March 25, 2024, and to exclude time between March 6, 2024, and March 25, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes wiretap recordings, thousands of pages of investigative reports, video, audio recordings, cell phone extractions, and other voluminous materials. On or about January 13, 2023, the government produced approximately 430 GBs of supplemental discovery. The government has

1 extended a formal plea offer.

2 b) Counsel for defendant desires additional time to consult with his client, review the  
3 voluminous discovery, conduct independent investigation, and prepare for the change of plea  
4 hearing.

5 c) Counsel for defendant believes that failure to grant the above-requested  
6 continuance would deny him the reasonable time necessary for effective preparation, taking into  
7 account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the  
10 case as requested outweigh the interest of the public and the defendant in a trial within the  
11 original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
13 et seq., within which trial must commence, the time period of March 6, 2024 to March 25, 2024,  
14 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T4]  
15 because it is so unusual or so complex, due to the number of defendants, the nature of the  
16 prosecution, or the existence of novel questions of fact or law, that it is unreasonable to expect  
17 adequate preparation for pretrial proceedings or for the trial itself within the time limits  
18 established by this section.

19 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
20 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
21 must commence.

22 IT IS SO STIPULATED.  
23  
24  
25  
26  
27  
28

1 Dated: February 28, 2024

PHILLIP A. TALBERT  
United States Attorney

2  
3 /s/ ANTONIO J. PATACA  
ANTONIO J. PATACA  
Assistant United States Attorney

4  
5  
6 Dated: February 28, 2024

/s/ PETER JONES  
PETER JONES  
Counsel for Defendant  
ANGEL SANCHEZ

7  
8  
9  
10  
11 **ORDER**

12 IT IS SO ORDERED.

13  
14 Dated: 2/29/2024

15  
16 Sheila K. Oberto  
THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE